

**BEFORE**  
**THE PUBLIC SERVICE COMMISSION OF**  
**SOUTH CAROLINA**  
**DOCKET NO. 2015-290-C**

IN RE:

Petition of the South Carolina	)	
Telephone Coalition for a Determination	)	
that Wireless Carriers are Providing	)	<b>PETITION TO INTERVENE</b>
Radio-Based Local Exchange Services	)	
in South Carolina that Compete with	)	
Local Telecommunications Services	)	
Provided in the State	)	

Petitioner CTIA-The Wireless Association® (“CTIA” or “Petitioner”), by its undersigned attorneys, hereby petitions the South Carolina Public Service Commission (the “Commission”), pursuant to Rule 103-825 of the Commission’s Rules, for an order allowing CTIA to intervene in the above referenced Docket, with full rights to participate as parties of record. In support of its petition, CTIA would show the Commission the following:

1. On August 11, 2015, the South Carolina Telephone Coalition (“SCTC”) filed a Petition seeking a “determination that carriers who offer retail wireless services in South Carolina are providing telecommunications services in South Carolina, and that they are providing radio-based local exchange services in this State that compete with local telecommunications service provided in this State.”

2. S.C. Code Ann. § 58-9-280(E)(2) states that the “Commission shall require all telecommunications companies providing telecommunications services within South Carolina to contribute to the USF as determined by the commission.”

3. Petitioner CTIA is an international nonprofit membership organization that has represented the wireless communications industry since 1984. Membership in the association includes wireless carriers and their suppliers, as well as providers and manufacturers of wireless data services and products. More information about CTIA is available on the Association’s website at <http://www.ctia.org/about-us>. As such, CTIA has an interest in this proceeding, will be affected by the outcome of this proceeding, and seeks to participate in this Docket in order to protect and pursue its interests.

4. Petitioner should therefore be permitted to intervene in this proceeding in order to participate fully and present testimony and other evidence as appropriate.

5. CTIA has not yet developed a position on the issues in this proceeding.

6. Petitioner’s authorized representative in this proceeding is:

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7. CTIA asserts that the granting of this Petition to Intervene will not in any way delay the proceedings in this Docket.

WHEREFORE, CTIA prays for the Commission to:

- a. Grant this Petition to Intervene and make Petitioner a party of record in Docket No. 2015-290-C, allowing Petitioner to participate fully and take such positions as it deems advisable; and
- b. Grant such other relief as the Commission deems just and proper.

Respectfully submitted,

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September 17, 2015  
Columbia, South Carolina

**BEFORE**  
**THE PUBLIC SERVICE COMMISSION OF**  
**SOUTH CAROLINA**  
**DOCKET NO. 2015-290-C**

IN RE:

Petition of the South Carolina	)	
Telephone Coalition for a Determination	)	
that Wireless Carriers are Providing	)	
Radio-Based Local Exchange Services	)	<b>CERTIFICATE OF SERVICE</b>
in South Carolina that Compete with	)	
Local Telecommunications Services	)	
Provided in the State	)	

This is to certify that I have caused to be served this day, the Petition to Intervene filed by CTIA-The Wireless Association®, as follows:

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September 17, 2015  
Columbia, South Carolina